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COURT, DISTRICT OF UTAH

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D. MARK JONES, CLERK

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IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH, NORTHERN DIVISION	
UNITED STATES OF AMERICA, Plaintiff, vs. WILLIAM CLYDE ALLEN, III, Defendant.	Case No. 2:18-MJ- <u>565</u> -DBP FELONY COMPLAINT (Magistrate Judge Dustin B. Pead)

Before Dustin B. Pead, United States Magistrate Judge for the District of Utah,
appears the undersigned, who on oath deposes and says:

COUNT 1

On or about September 24, 2018, in the Northern Division of the District of Utah,
WILLIAM CLYDE ALLEN, III,
the defendant herein, did knowingly threaten to use a biological toxin, namely RICIN, as
a weapon; all in violation of 18 U.S.C. § 175(a).

COUNT 2

Between on or about September 24, 2018, through October 1, 2018, in the Northern Division of the District of Utah,

WILLIAM CLYDE ALLEN, III,

the defendant herein, did knowingly cause to be delivered by the Postal Service according to the directions thereon a communication, addressed to “Pres Trump, The White House, 1600 Pennsylvania Avenue, NW, Washington, DC 20500,” who is President of the United States of America and an officer and employee of the United States under 18 U.S.C. § 1114, and containing a threat to injure President Donald J. Trump; all in violation of 18 U.S.C. § 876(c).

COUNT 3

Between on or about September 24, 2018, through October 1, 2018, in the Northern Division of the District of Utah,

WILLIAM CLYDE ALLEN, III,

the defendant herein, did knowingly cause to be delivered by the Postal Service according to the directions thereon a communication, addressed to “James N. Mattis, Secretary of Defense, 1000 Defense Pentagon, Washington, DC 20301-1000,” who is United States Secretary of Defense and an officer and employee of the United States under 18 U.S.C. § 1114, and containing a threat to injure Secretary James N. Mattis; all in violation of 18 U.S.C. § 876(c).

COUNT 4

Between on or about September 24, 2018, through October 1, 2018, in the Northern Division of the District of Utah,

WILLIAM CLYDE ALLEN, III,

the defendant herein, did knowingly cause to be delivered by the Postal Service according to the directions thereon a communication, addressed to “Admiral John M. Richardson, Chief of Naval Operations, 2000 Navy Pentagon, Washington, DC 20350-2000,” who is Chief of Naval Operations, United States Navy, and is an member of the uniformed services of the United States under 18 U.S.C. § 1114, and containing a threat to injure Admiral John M. Richardson; all in violation of 18 U.S.C. § 876(c).

COUNT 5

Between on or about September 24, 2018, through October 3, 2018, in the Northern Division of the District of Utah,

WILLIAM CLYDE ALLEN, III,

the defendant herein, did knowingly cause to be delivered by the Postal Service according to the directions thereon a communication, addressed to “Christopher A. Wray, FBI Headquarters, 935 Pennsylvania Ave. NW, Washington, DC 20535-0001,” who is Director of the Federal Bureau of Investigation, United States Department of Justice, and is an officer and employee of the United States under 18 U.S.C. § 1114, and containing a threat to injure Director Christopher A. Wray; all in violation of 18 U.S.C. § 876(c).

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

This complaint is based on information obtained through an investigation consisting of the following:

1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since September 2011. I am currently assigned to the Salt Lake City Division and am charged with investigating acts of domestic terrorism. I am tasked with the investigation of federal criminal offenses, including the investigation of weapons of mass destruction (“WMD”), which comprise, in part, biological agents, toxins, explosive devices, and related materials. During my law enforcement career, I have conducted investigations into violations of numerous federal laws that resulted in arrests, convictions, issuance of search authorities, and seizure of evidence. I have participated in the execution of numerous search and seizure warrants for evidence associated with federal crimes. This affidavit is intended to show only that there is sufficient probable cause for the arrest of William Clyde Allen, III, (hereinafter “ALLEN III”) for violating 18 U.S.C. § 175(a) (Knowingly Threaten To Use A Biological Toxin As A Weapon); and 18 U.S.C. § 876(c) (Mailing Threatening Communications) and does not set forth all of my knowledge about this matter.

2. I am familiar with the facts and circumstances alleged in this complaint which are based on my review of reports or statements made to me by other law enforcement officers.

3. On October 1, 2018, I received information from FBI Headquarters

(FBIHQ) that a letter had been sent to the President of the United States, Donald Trump. The envelope, stamped by the United States Postal Service on September 24, 2018, contained the return address of WM ALLEN, 380 N 200 W, Logan, UT 84321. Law enforcement confirmed that William Clyde Allen, III, (ALLEN III) resides at 380 N 200 W, Logan, Utah, 84321. The contents of the envelope included a note that read, "Jack and the Missile Bean Stock Powder." In addition, there appeared to be ground castor beans inside of the envelope. Preliminary field testing yielded a positive result for Ricin. Laboratory Response Network (LRN) testing confirmed the initial examination results later that day. I confirmed through United States Secret Service Agents and the United States Postal Inspector's Office that ALLEN III currently resides at 380 N 200 W, Logan, UT.

4. Also on October 1, 2018, the Pentagon Mailing Facility received two letters from the same return address as above. One letter was addressed to Secretary of Defense, James N. Mattis, and the other letter was addressed to Chief of Naval Operations, Admiral John M. Richardson. Both letters contained small pieces of what appeared to be castor beans and a note with the same message, "Jack and the Missile Bean Stock Powder."

5. On October 3, 2018, the FBI Mailing Facility discovered a letter addressed to FBI Director Christopher Wray. The return address on the envelope was WM ALLEN 380 N 200 W Logan, UT. The contents included a note identical to the ones addressed to President Trump, Secretary of Defense Mattis, and Admiral Richardson and particles consistent with ground castor beans.

6. On October 3, 2018, a FBI Laboratory Biologist informed me that the letters to the President and the Pentagon tested positive for Ricin as a result of two different examinations. The following day, the FBI Laboratory advised the fourth letter, addressed to FBI Director Wray, also tested positive for Ricin.

7. In the past, ALLEN III has issued numerous threats toward government officials. For example, in 2015, ALLEN III sent an email to the CIA threatening to kill the President if the Agency did not stop infringing on his Constitutional Rights. United States Secret Service Agents interviewed ALLEN III at his Logan, UT residence regarding this threat.

8. Furthermore, ALLEN III sent a bomb threat to Lackland Air Force Base, Bexar County, Texas, in February 2017 which read, "I have a bomb to kill your people." Air Force Internal Affairs identified the email was sent from "William Allen." The internet protocol (IP) address associated with the email correspondence was traced back to the Salt Lake City, Utah, area. Federal law enforcement officers interviewed ALLEN III at his residence in Logan, Utah, regarding this incident. During the interview, ALLEN III admitted to sending the threat from the ALLEN III's email address.

9. Additionally, on December 3, 2017, ALLEN III used his Facebook account to post a youtube.com video entitled, "Extracting Cyanide from Apple Seeds with Hydraulic Press." ALLEN III commented, "Don't eat apple seeds."

10. Finally, on September 26, 2018, ALLEN III sent an email to Utah

Department of Public Safety entitled, "Multiple Imminent Radiation Attacks..." ALLEN III included his name and phone number. Agents queried the number and confirmed it belonged to ALLEN III.

11. On October 3, 2018, federal law enforcement executed a search warrant on 380 N. 200 W. Logan, UT. During the search warrant, ALLEN III was found to be alone in the residence. Agents escorted ALLEN III off the property and into an unmarked FBI vehicle in front of his house. There, I read ALLEN III his rights. ALLEN III expressed understanding and stated he was willing to answer questions at that time.

12. During the interview, ALLEN III was shown photographs of letters sent to President Trump, Secretary Mattis, Admiral Richardson, and Director Wray. ALLEN III was also shown photographs of the aforementioned notes contained in each envelope. ALLEN III explained he had sent those letters on or about September 24, 2018, from the post office near his house. ALLEN III stated he had also placed a castor bean in each envelope. ALLEN III further informed he had sent other letters with the same contents to Attorney General Jeff Sessions, the Queen of England, Russian President Vladimir Putin, and the Secretary of the Air Force (whose name he did not recall). ALLEN III said he sent the letters to send a message. ALLEN III did not elaborate with regards to the message he intended to convey. ALLEN III said he had performed an Internet search of the mailing addresses for each recipient approximately an hour before sending the letters.

13. ALLEN III explained castor beans contain a poison called Ricin. He (ALLEN III) stated he had researched Ricin on the Internet on one of his electronic devices at his residence. In addition, ALLEN III advised he had purchased approximately 100

castor beans from eBay. ALLEN III said he still had the package and the remaining castor beans in the basement of his residence. During the search of the residence, FBI personnel found the package of castor beans as indicated by ALLEN III. When asked about the purpose of purchasing the castor beans, ALLEN III said he wanted to have them in case World War III broke out. ALLEN III elaborated and stated he could make them useful, to bear arms, and to defend our nation. ALLEN III believed he had not used any other castor beans, except the ones sent on or about September 24, 2018.

14. ALLEN III provided written consent for the FBI to access and search his eBay account. ALLEN III furnished me with his user name and password. On October 4, 2018, FBI personnel accessed ALLEN III's eBay account and searched the account's purchases. We discovered that on December 3, 2017, ALLEN III had made two purchases of castor beans in quantities of 100 and 30.

RICIN

15. Ricin is a toxin as defined in 18 U.S.C. § 178(2). Ricin is listed as a select agent by the United States Department of Health and Human Services.¹ See 42 C.F.R. § 73.3. Ricin naturally exists in, and may be extracted from, the seeds of the castor bean plant (*ricinus communis*). The extraction of Ricin from these seeds is relatively easy and does not require technical expertise. Procedures and methods for this extraction are available from open sources on the Internet.

¹ Select agents and toxins are a subset of biological agents and toxins that the Departments of Health and Human Services ("HHS") and Agriculture ("USDA") have determined to have the potential to pose a severe threat to public health and safety, to animal or plant health, or to animal or plant products.

16. Small doses of Ricin are lethal to human beings if ingested, inhaled, or injected. Symptoms from poisoning from Ricin can include difficulty breathing, nausea, vomiting, and diarrhea, with possible death occurring within 36 to 72 hours. According to information posted by the Center for Disease Control ("CDC") on its website, there are no known antidotes for poisoning from Ricin.

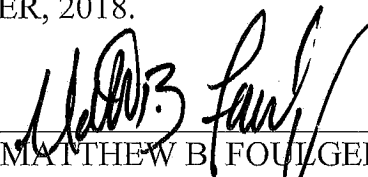
17. Extracting the Ricin from the seeds of the plant may involve the use of milling and grinding equipment. In addition, solvents – including but not limited to acetone, lye, chloroform and diethyl ether – may be used for the extraction. Laboratory glassware is also equipment that is well-suited to the extraction and purification processes involved in the manufacture and production of Ricin.

18. Due to the risk of death posed by the inhalation of this toxin, the use of a respirator or other barrier to inhalation is critically important when handling Ricin in powder form.

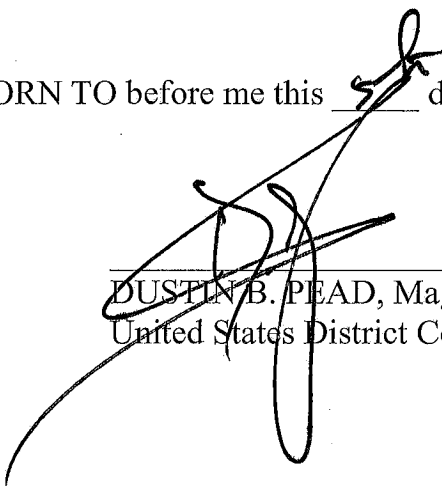
CONCLUSION

Based upon the foregoing, Affiant submits that there is probable cause to believe that William Clyde Allen, III, has violated 18 U.S.C. § 175(a), (Did Knowingly Threaten To Use A Biological Toxin, namely Ricin, As A Weapon) and 18 U.S.C. § 876(c) (Mailing Threatening Communications).

DATED this 5th day of OCTOBER, 2018.


MATTHEW B. FOULGER, Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO before me this 5th day of OCTOBER, 2018.



DUSTIN B. PEAD, Magistrate Judge
United States District Court

REVIEWED:

JOHN W. HUBER
United States Attorney



MARK K. VINCENT
Assistant United States Attorney